

FILED

SEP 21 2016

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBIN MATTHEWS,

Defendant.

No.

4:16CR00416 RWS/SPM

INDICTMENT

COUNT 1

The Grand Jury charges:

A. Introduction

1. On May 18, 2016, a federal grand jury sitting in the Eastern District of Missouri indicted Robin Matthews on one count of mail fraud, one count of access device fraud, and three counts of aggravated identity theft relative to conduct arising from her employment with United Health Care.
2. Criminal case number 4:16CR00208 HEA/DDN was assigned to the indictment.
3. Since defendant was released pretrial, the Federal Pretrial Services Office provided supervision on behalf of the United States District Court. Defendant was provided written confirmation of any verbal instructions representatives from the Federal Pretrial Services Office provided. This included a document on the letterhead of the Pretrial Services Office

for the Eastern District of Missouri, and signed by T.C. in which defendant was advised not to obtain a passport.

4. On May 24, 2016, defendant was ordered by the United States District Court not to engage in any employment that provided her access to third party identifying information.

5. During the course of the judicial proceedings in criminal case number 4:16CR00208 HEA/DDN, defendant was provided a printout of her prior criminal history that was prepared by H.B. of the United States Postal Inspection Service.

6. In August 2016, defendant submitted an online application for a job as a claims auditor for a health care company with an office located in the Eastern District of Missouri.

7. While the office was located in the Eastern District of Missouri, the company screening the employment applications was located in Orlando, Florida. When the employment screening company contacted defendant, defendant advised that she was not the subject of criminal case number 4:16CR00208 HEA/DDN, and had been the victim of identity theft.

8. Defendant altered a letter signed by T.C. from the Federal Pretrial Services Office, and the printout of her criminal history that was provided by the United States Postal Inspection Service, so that the documents supported her claim that she was not the subject of the criminal indictment. Defendant electronically transmitted the altered documents from the Eastern District of Missouri to the employment screening service in Orlando, Florida.

B. On or about September 9, 2016, within the Eastern District of Missouri, the defendant,

ROBIN MATTHEWS,

in a matter affecting interstate commerce, knowingly transferred, possessed, and used, without

lawful authority, the means of identification of another, that being the name of T.C., with the

intent to commit, and in connection to the felony crime of forgery, Missouri Revised Statutes

570.090.

In violation of Title 18, United States Code, Section 1028(a)(7).

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

TRACY LYNN BERRY - 014753 TN
Assistant United States Attorney